

Comment to the Postal Regulatory Commission (Docket No. N2021–1)
From D. Cassandra Fletcher, Ph.D.
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A popular song lyric came to mind as I began my response to Postmaster General Louis DeJoy's proposed 10-year plan for the USPS: "Before you abuse, criticize and accuse, walk a mile in my shoes." With that in mind, I tried to look at USPS from his perspective and those of his Board of Governors.

With respect to the same, American consumers clearly no longer rely only on the USPS to send mail. Widespread use of electronic communications and the Internet means we are sending far less mail than we used to. Accordingly, USPS revenues have declined along with decreased mail volume.

The USPS now has a deficit of approximately \$160 billion. While debt is burdensome, carrying it has become an accepted way of life for the federal government, its agencies and private citizens alike. Consider that the U.S. national debt was \$3.13 trillion in 2020. The USPS deficit pales in comparison. I would nevertheless agree that the Postmaster General is obligated to find solutions to reduce or eliminate it.

After DeJoy had been on the job for just ten weeks, there was a noticeable slowdown in mail delivery services, accompanied by an avalanche of consumer and business complaints. Around this time, too, Trump was loudly voicing his opposition to mail-in voting. The confluence of these events heightened suspicions and led to closer scrutiny of the new Postmaster General.

Louis DeJoy, a wealthy North Carolina businessman, had been a longtime Republican fundraiser, and a cash cow, for Trump and other Republican politicians. DeJoy invested \$1.2 million in Trump's 2016 campaign and the Republican National Committee. He and his wife together contributed \$3.3 million to elect 2016 Republican candidates. He had served as the Deputy National Finance Chair and, subsequently, as the National Finance Chair, of the Republican Party.

The newly appointed Postmaster General was initially backed by an all-white, all male USPS Board of Governors, led by Robert Duncan, a former director of two Republican super PACS – American Crossroads and

the Senate Leadership Fund. This is how Trump set the stage for the present politicization of the USPS, with measurably disastrous effects.

DeJoy prioritized Trump's false assertions about the dangers and risks of mail-in voting in 2020. With unseemly haste, he and the USPS Board of Governors adopted measures which damaged USPS mail deliveries, postal worker income and postal worker morale. New policies included: 1) cuts to post office hours, 2) strict enforcement of delivery schedules, 3) mail abandoned in facilities because mail trucks were sent off only partially filled, 4) prohibitions on extra trips to ensure on-time mail deliveries, 5) cutbacks on overtime hours and pay for postal workers, 6) the destruction of high-speed mail sorting machines and 7) the removal of public mailboxes.

Trump, meanwhile, opposed extra funding to USPS for mail-in voting. He was unmoved by arguments that mail-in voting during the 2020 election was safe, would ensure voter participation, would protect voter safety during the pandemic he himself had mismanaged, with deadly consequences for hundreds of thousands of Americans.

At subsequent Congressional hearings, DeJoy responded to legislators' questions about consumer complaints with arrogance, taunts and contempt. His disrespectful behavior, so characteristic of Trump and some of appointees, called into question exactly whom DeJoy felt he was appointed to serve.

DeJoy was openly hostile toward Democratic legislators and signaled disinterest in the input of Board members expected to be appointed by the newly elected President Joe Biden. DeJoy has not acted as though he serves in a position of public trust, but as the loyal crony and henchman of the twice-impeached, disgraced, former president Trump.

DeJoy's actions ultimately harmed many people who rely on the USPS for the timely arrival of everything from prescription medications, to benefits checks, to online orders.

Wherever actual people are mentioned in the 10-year- plan (e.g., postal workers, consumers and retirees, it seems DeJoy and the Board of Governors are determined to inflict pain. They have closed facilities, reduced post office hours of operation, cut overtime shifts and altered mail delivery schedules.

Of particular concern to me is DeJoy's frontal assault on postal workers and their union. His austerity measures include getting the bulk of his savings from moving postal service retirees out of a hard-won, pre-funded, healthcare benefit and switching them to Medicare. He proposes tinkering with pension funds through adjustments to the Civil Service Retirement System. He has further requested a review of what USPS paid into federal pension funds, with an eye toward clawing back any overpayments. DeJoy values profits over the USPS workforce, as well as the people it serves. He must not be allowed to balance the budget on the backs of both.

Aside from his financial ties to the former president, his partisan politics and a business model destined to eliminate the human face of USPS, there are other reasons why DeJoy's 10-year plan should not go forward.

The most damning is that DeJoy's solutions are strongly skewed toward self-dealing for his financial benefit. He would likely profit off his proposals, just as his family trucking business, New Breed Logistics, profited off past contracts with USPS and other government entities. From 2015 to 2018, DeJoy was both a CEO and a member of the Board of Directors at XPO Logistics, the company to which he sold New Breed Logistics for \$615 million. Although he left XPO Logistics in 2018, he holds a stake in the company between \$30-\$75 million. He and his wife are also invested in USPS competitors, including the United Parcel Service. As if these conflicts of interest aren't enough to give one pause, DeJoy's North Carolina companies faced past charges of anti-union hiring practices and discrimination on grounds of race and gender.

DeJoy hopes to shift the 12% of first-class mail, now delivered by commercial or chartered airplanes, to ground transportation. This will prolong the standard delivery time for first-class mail. Common sense suggests that using more gasoline-powered trucks will increase air pollution and wear-and-tear on our already crowded and deteriorating roads. The idea begs for an environmental impact study, and a cost-benefit analysis.

Given that climate change is pushing America away from fossil fuel to vehicles powered by renewable energy, no portion of the 10-year-plan addresses the viability of an all-electric USPS fleet, the relative scarcity of electric charging stations and potential additional costs, e.g., a user tax on electric vehicles. Harnessing the power of artificial intelligence to improve USPS workforce and operations also warranted a mention. After all, drones and robots are already engaged in the package delivery business.

DeJoy has built his plan instead upon his largely upon his projection that e-commerce will increase from 5% to 11% each year over the next four years. Accordingly, he calls for: 1) 45 package processing annexes to expedite shipping, 2) replacing mail-sorting machines with package sorters and 3) introducing “products” to help commercial shippers move packages more efficiently.

DeJoy and the USPS Board of Governors must not be allowed to destroy USPS, in order to remake it in the image of a Louis DeJoy business. This 10-year plan exemplifies the law of the instrument, or “Abraham Maslow’s hammer”. To paraphrase it, “When all you have is a hammer, everything looks like a nail.”

Political conflicts, on top of business conflicts, on top of labor conflicts - all compounded by persistent questions of character - should have precluded DeJoy’s appointment as Postmaster General in the first place. DeJoy’s politicization of the USPS is neither altruistic nor benign. He is laying the groundwork for the privatization of a public institution enshrined in our Constitution and beloved by the American people. My recommendations therefore are: 1) fire Louis DeJoy, 2) choose a Postmaster General with experience in post office operations, 3) discard the 10-year plan and 4) create a plan which honors USPS history, traditions and the stake that We The American People have in it.